

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
TERRE HAUTE DIVISION

DEPAUW UNIVERSITY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CAUSE NO.: 2:05-cv-0249-RLY-WGH
	)	
HENNESSEE GROUP, LLC,	)	
CHARLES GRADANTE and	)	
E. LEE HENNESSEE,	)	
	)	
Defendants.	)	

**MOTION FOR 15-DAY EXTENSION OF TIME  
TO RESPOND TO COMPLAINT  
(WITH PLAINTIFF'S CONSENT)**

Defendants Hennessee Group, LLC, Charles Gradante and E. Lee Hennessee (collectively "Defendants"), by their counsel, move for entry of an Order, extending by 15 days, to and including December 27, 2005, the time in which Defendants may answer, move or otherwise respond to the complaint. In support of this motion, Defendants state:

1. After an initial 30-day extension of time under Local Rule 6.1(a), Defendants' answer, motion or other response to the complaint is due December 12, 2005, which time has not expired.
2. Additional time is necessary to prepare and file an adequate response, and the requested extension is not sought for purposes of undue delay.
3. On December 9, 2005, Defendants' counsel spoke with David Herzog, counsel for plaintiffs, who consented to the requested 15-day extension.

WHEREFORE, Defendants pray for entry of an Order, extending by 15 days, to and including December 27, 2005, the time within which they may answer, move or otherwise respond to the complaint.

Respectfully submitted,

*s/ Lee B. McTurnan*

*s/ Wayne C. Turner*

*s/ Anne L. Cowgur*

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Attorneys for Defendants Hennessee Group, LLC,  
Charles Gradante, and E. Lee Hennessee

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of December, 2005, a copy of the foregoing "Motion For 15-Day Extension Of Time To Respond To Complaint" was filed electronically. Notice of this filing will be sent to the following persons by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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Matthew T. Albaugh  
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s/ Anne L. Cowgur  
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Charles Gradante, and E. Lee Hennessee